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February 3, 2020

Via ECF and First-Class Mail

Hon. Susan D. Wigenton
United States District Court for the District of New Jersey
Martin Luther King Building and U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Church VI v. Glencore plc, et al., Case No. 2:18-cv-11477-SDW-CLW

Dear Judge Wigenton:

I write on behalf of Defendants Glencore plc, Ivan Glasenberg, and Steven Kalmin in the above-captioned matter to request respectfully that Defendants be permitted to file a consolidated joint brief of up to 60 pages in support of their motion to dismiss the complaint, due on February 7, 2020. Absent an enlargement, briefs are limited to 40 pages under Local Rule 7.2.

Defendants respectfully submit that enlargement of the page limit for a joint brief is necessary to permit the three Defendants to set forth their respective grounds for dismissal and to adequately address the allegations in the Amended Complaint, which numbers 345 paragraphs across 93 pages, challenges numerous public statements allegedly made by Defendants over the course of the more than 3-year proposed class period, and raises numerous complex legal and factual issues. Among other things, Defendants intend to move to dismiss the Amended Complaint (1) under Fed. R. Civ. P. 12(b)(2), based on Plaintiffs' failure to establish a basis for the Court to exercise personal jurisdiction over Defendants; (2) under Fed. R. Civ. P. 12(b)(6), because Plaintiffs fail to state a claim against any of the Defendants; and (3) under the doctrine of *forum non conveniens*. Defendants believe that the requested enlargement for a single consolidated joint brief including all arguments on behalf of the three separate Defendants will permit them to more comprehensively and efficiently address the relevant issues in a manner that will benefit the Court and the parties.

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Defendants' counsel have met and conferred with Plaintiffs' counsel, who have stated that they do not oppose this request. Defendants will not oppose a comparable enlargement of the page limit applicable to Plaintiffs' anticipated brief in opposition to Defendants' motion to dismiss.

We thank the Court for its consideration of this request.

Respectfully submitted,



Susan M. Leming

cc: All Counsel of Record (via ECF and Email)



So Ordered

this 4th day of Feb. 2020



Susan D. Wigenton, U.S.D.J.